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Attorneys for Plaintiff
JOSE OBSUNA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSE OBSUNA,

Case No. C-05-5220-CW

Plaintiff,

**STIPULATION AND ~~[PROPOSED]~~
ORDER FOR EXTENSION OF
DEADLINE TO COMPLETE
MEDIATION**

v.

AMERICAN SHIP MANAGEMENT, LLC,
AMERICAN PRESIDENT LINES, LTD.,

Defendants. _____/

The parties to the above-entitled action, by and through their respective attorneys herein, hereby stipulate and respectfully request the Court to order an extension of the deadline for mediation for a period of forty-five (45) days, from December 1, 2006 to January 15, 2007, as there are numerous discovery matters to complete without which mediation would not be as meaningful.

There have been no prior extensions of this deadline.

Dated: October 26, 2006

EMARD DANOFF PORT
TAMULSKI & PAETZOLD

By _____/s/_____
Kevin J. Odell
Attorneys for Defendant
American Ship Management

Dated: October 26, 2006

LAW OFFICES OF LYLE C. CAVN, JR.

By _____ /s/ _____
Lyle C. Cavin, Jr.
Attorneys for Plaintiff
Jose Obsuna

IT SO ORDERED.

10/30/06



UNITED STATES DISTRICT JUDGE